



Upper Mokelumne River Watershed Authority

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November 11, 2015

Mr. Keith Wallace, Project Manager
California Department of Water Resources
Division of Integrated Regional Water Management
Post Office Box 942836
Sacramento, CA 94236

Subject: Comments on Draft Proposition 84 IRWM 2015 Implementation Grant Solicitation Funding Recommendations for the Mokelumne/Amador/Calaveras IRWM Region

Dear Mr. Wallace,

The Upper Mokelumne River Watershed Authority (UMWRA), the Regional Water Management Group for the Mokelumne/Amador/Calaveras IRWM Region (Region), would like to thank the California Department of Water Resources (DWR) for the opportunity to provide input on the draft funding recommendations for the Proposition 84 IRWM 2015 Implementation Grant. We have reviewed DWR's evaluation and scoring of our proposal and have the following comments and one recommended future process enhancement.

Comments on Scoring

Question 2: Does the Budget contain a summary budget for the proposal? *Proposal was given 0 points. We disagree with this assessment for the reason listed below.*

A "Proposal Budget" was provided on page one of the budget attachment, labeled Table 5-1: Proposal Budget. Though mislabeled as being Table 8 from the PSP as opposed to Table 9, the table is still titled to indicate that it is the proposal level budget summary, and it includes a summary budget for each project in the proposal with all information required in the PSP. As such, we respectfully ask that DWR consider revising our "Proposal-Level" score to 7 instead of 6.

Question 7: Is there a project map that shows the location of the project, the areas affected by the project and the areas and water resources affected by the project? *Lake Camanche Service Lateral Replacement – Phase 3, and Sheep Ranch Drinking Water Compliance Project, were both given 0 points. We disagree with this assessment for the reasons listed below.*

Lake Camanche Service Lateral Replacement – Phase 3: Two maps were provided showing the Lake Camanche Service Lateral Replacement – Phase 3 project location, affected areas and the water resources affected by the project, and can be found on pages 6 and 7 of Attachment 2. Figure 2-2 of Attachment 2 provides the project location that serves as the affected area and the affected water resources, which includes only the Cosumnes Groundwater Basin. Figure 2-3 provides greater detail of the location of where service laterals will be replaced and therefore the affected area. As such, we respectfully ask that DWR consider revising our "Project-Level" score for Question 7 to 1 instead of 0.

Sheep Ranch Drinking Water Compliance Project: Three maps were provided showing the Sheep Ranch Drinking Water Compliance Project location, affected areas and the affected water resources, and can be found on pages 16-18 of Attachment 2. Figure 2-4 provides a zoomed-out map showing the location of the Sheep Ranch service area, the location of the Sheep Ranch WTP, and the water resources from which the WTP draws water (the affected water resources). Figures 2-5 and 2-6 provide a more detailed view of the service area, WTP location and pipeline

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locations, providing greater detail on project location and affected area. As such, we respectfully ask that DWR consider revising our “Project-Level” score for Question 7 to 1 instead of 0.

Question 8: Are the anticipated primary and secondary physical benefits of the project described and quantified with the units specified in Table 5? *Lake Camanche Service Lateral Replacement – Phase 3, Sheep Ranch Drinking Water Compliance Project and MAC Region Water Conservation Program* given 0 points. We disagree with this assessment for the reasons listed below.

Lake Camanche Service Lateral Replacement – Phase 3: Table 5 was completed for each of the two benefits provided for the project in the units required, as shown on page 8 of Attachment 2. Table 2-2 provides the primary physical benefit, which is water supply saved in AFY (units allowable according to the PSP), and shows the 3.6 AFY expected for the lifetime of the project (2017-2086). Table 2-3 provides the secondary physical benefit, which is water quality improved in mg/L (units allowable according to the PSP), and shows the 0.91 mg/L reduction expected for the lifetime of the project (2017-2086). Comments were provided in the bottom row of the table to further explain each benefit. As such, we respectfully ask that DWR consider revising our “Project-Level” score for Question 8 to 1 instead of 0.

Sheep Ranch Drinking Water Compliance Project: Table 5 was completed for each of the two benefits provided for the project in the units required, as shown on pages 20-21 of Attachment 2. Table 2-4 provides the primary physical benefit, which is water supply saved in AFY (although the units are stated as AF, they represent AF per year), and shows the 0.06 AFY of water supply that will be saved for the lifetime of the project (2017-2041). Table 2-5 provides the secondary benefit of water quality improved in both mg/L and pounds, where alum reduction is expected to be reduced by 1.0 mg/L for each year of the project lifetime from 2017-2041. Providing the remaining constituents in mg/L was not feasible. Comments were provided in the bottom row of the table to further explain each benefit. As such, we respectfully ask that DWR consider revising our “Project-Level” score for Question 8 to 1 instead of 0.

MAC Region Water Conservation Program: Table 5 was completed for each of the two benefits provided for the project in the units required, as shown on pages 30-31 of Attachment 2. Table 2-6 provides the primary physical benefit, which is water supply saved in AFY (units allowable according to the PSP), and shows the water supply saved per year throughout the useful life of the project based on the implementation schedule of each of the project components as described in the table comments and later in the attachment. Table 2-7 provides the secondary physical benefit, which is water quality improved in mg/L (units allowable according to the PSP), and shows the water quality improved for three constituents for the lifetime of the project (2017-2035). Comments were provided in the bottom row of the table to further explain each benefit. As such, we respectfully ask that DWR consider revising our “Project-Level” score for Question 8 to 1 instead of 0.

Question 9: Does the technical analysis support the claimed physical benefits? *Lake Camanche Service Lateral Replacement – Phase 3, and Sheep Ranch Drinking Water Compliance Project*, were both given 0 points. We disagree with this assessment for the reasons listed below.

Lake Camanche Service Lateral Replacement – Phase 3: As shown on pages 9 and 10 of Attachment 2, all elements required by this questions were answered in detail, including need for the project, without-project conditions, and a description of methods used to estimate benefits. Answers were provided for both the primary and secondary benefits. As such, we respectfully ask that DWR consider revising our “Project-Level” score for Question 9 to 1 instead of 0.

Sheep Ranch Drinking Water Compliance Project: As shown on pages 20 through 23 of Attachment 2, all elements required by this questions were answered in detail, including need for the project, without-project conditions, and a description of methods used to estimate benefits. Answers were provided for both the primary and secondary benefits. As such, we respectfully ask that DWR consider revising our “Project-Level” score for Question 9 to 1 instead of 0.

Question 14: Is the proposed project the least cost alternative? If not, does the applicant sufficiently explain why it was selected instead of the least cost alternative? *Lake Camanche Service Lateral Replacement – Phase 3,*

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and Sheep Ranch Drinking Water Compliance Project, were both given 0 points. We disagree with this assessment for the reasons listed below.

Lake Camanche Service Lateral Replacement – Phase 3: As stated in the Cost Effectiveness Analysis on page 13 of Attachment 2, there are no alternative materials or methods existing that would achieve the same results as the project, which replaces railing “poly tube” service laterals with industry standard materials. Therefore, there was no other alternative to consider. As such, we respectfully ask that DWR consider revising our “Project-Level” score for Question 14 to 1 instead of 0.

Sheep Ranch Drinking Water Compliance Project: As stated on pages 25-26 of Attachment 2, no other alternatives were considered given that the proposed project will use best available technology approved by the SWRCB DDW, and is being undertaken per recommendation from SWRCB DDW staff. Though Calaveras County Water District staff will still evaluate the cost of technologies prior to purchase of a packaged plant, it’s expected that the purchased filtration plant planned for the project will be the least cost alternative over the project lifecycle. As such, we respectfully ask that DWR consider revising our “Project-Level” score for Question 14 to 1 instead of 0.

Question 17: If applicable, does the Work Plan include a listing of required permits and their status, and the appropriate environmental documentation for the proposed project? *Sheep Ranch Drinking Water Compliance Project, and MAC Region Water Conservation Program, were both given 0 points. We disagree with this assessment for the reasons listed below.*

Sheep Ranch Drinking Water Compliance Project: As stated on page 6 of Attachment 3, the Sheep Ranch Drinking Water Compliance Project lists required CEQA documentation under Task 6: CEQA Documentation, which is expected to include a CEQA notice of exemption, and lists required permits under Task 7: Permitting, which are expected to include an amendment to its Domestic Water Supply Permit and approved amended operations permit. As such, we respectfully ask that DWR consider revising our “Project-Level” score for Question 17 to 1 instead of 0.

MAC Region Water Conservation Program: As stated on page 10 of Attachment 3, the MAC Region Water Conservation Program is not expected to require CEQA documentation, as noted under Task 6: CEQA Documentation, and is not expected to require permitting as noted under Task 7: Permitting, although, as noted in the attachment, should construction permitting be necessary for larger conservation equipment installation, it will be evaluated on a case-by-case basis. As such, we respectfully ask that DWR consider revising our “Project-Level” score for Question 17 to 1 instead of 0.

Recommended Future Process Enhancement

We appreciate that DWR has provided project-specific scores for each question for the Proposition 84 IRWM 2015 Implementation Grant; however, in future rounds we recommend DWR also provide rationale for the scores to better communicate how DWR applies the scoring criteria and thus add greater transparency to the scoring process.

Conclusion

Again, we appreciate this opportunity to comment on the draft funding recommendations for the Proposition 84 IRWM 2015 Implementation Grant to DWR. We greatly value our participation in the statewide IRWM Program and hope our comments are useful in finalizing proposal scoring for the final grant awards.

Sincerely,

Rob Alcott

Rob Alcott
Executive Officer

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